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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BIANCA LANG-BLACK, an individual,

Plaintiff,

vs.

AAA LIFE INSURANCE COMPANY; a
foreign corporation; and DOES I through V,
and ROE CORPORATIONS I through V,
inclusive,

Defendants.

Case No. 2:23-cv-00117-GMN-DJA

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
FILE ITS REPLY BRIEF IN SUPPORT
OF ITS MOTION FOR PARTIAL
SUMMARY JUDGMENT**

(FIRST REQUEST)

Plaintiff, Bianca Lang-Black, and Defendant, AAA Life Insurance Company (“AAA” or “Defendant”), by and through their respective counsel of record, hereby stipulate that:

1. Defendant filed its Motion for Partial Summary Judgment on the Pleadings as to Plaintiff’s Second Cause of Action for Violation of Unfair Practices in Settling Claims Pursuant to Fed. R. Civ. P. 12(c) on March 7, 2023 (ECF No. 12).

2. Plaintiff filed her Response to Defendant’s Motion for Partial Summary Judgment on the Pleadings as to Plaintiff’s Second Cause of Action for Violation of Unfair Practices in Settling Claims Pursuant to Fed. R. Civ. P. 12(c) on March 21, 2023 (ECF No. 13).

3. That Defendant’s Reply brief is presently due on March 28, 2023. However, due to scheduling difficulties with Defendant AAA’s counsel, including multiple recent mediations (March 23, 2023; and today, March 27, 2023,) and depositions (March 31, 2023), coupled with

the need for client review of any submission, additional time is needed by Defendant AAA to file its reply brief. This request is not made for an improper purpose or to unnecessarily delay these proceedings. This is the first request for an extension of the deadline for Defendant AAA to file its Reply brief.

4. The parties agree that Defendant shall have until April 4, 2023, to file its Reply Brief.

IT IS SO STIPULATED.

Dated: March 27, 2023

HALL JAFFE & CLAYTON, LLP

/s/ Riley A. Clayton

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Dated: March 27, 2023

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ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT COURT JUDGE

Dated: March 27, 2023